

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA and)
THE PEOPLE OF THE VIRGIN ISLANDS,)
v.)
MOHAMMED JUBRAN,)
Defendants.)
_____)

FILED UNDER SEAL

INDICTMENT

CRIMINAL NO. 2016- 35

The Grand Jury charges that:

COUNTS ONE THROUGH THREE

Trafficking Firearms in Interstate and Foreign Commerce

From on or about September 1, 2015 through on or about February 10, 2016, at St. Thomas, in the District of the Virgin Islands and elsewhere, the defendants,

MOHAMMED JUBRAN,

aided and abetted by each other and others known and unknown, and not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, in the course of the business of dealing in firearms, did transport each of the firearms listed below in interstate and foreign commerce, with each such instance constituting a separate count of the Indictment, as set forth below:

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COUNT	DESCRIPTION OF FIREARM
1	ITM Arms Co., model AK-47, 5.45x39mm caliber, serial number 0001973
2	Beretta 9mm, model 92FS, serial number BER435278
3	Romarm CUGIR, 7.62mm, serial number obliterated

All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

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The Grand Jury further charges that:

COUNT FOUR

Possession of a Firearm in a School Zone

On or about October 28, 2015, at St. Thomas, in the District of the Virgin Islands, the defendant,

MOHAMMED JUBRAN,

did knowingly possess a firearm, that is, a Beretta 9mm, model 92FS, serial number BER435278, that had moved in and affected interstate commerce, within 1000 feet of the grounds of the St. Peter and Paul School, a place that the defendant knew and had reasonable cause to believe was a school zone.

All in violation of Title 18, United States Code, Sections 922(q)(2)(A) and 924(a)(4).

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The Grand Jury further charges that:

COUNT FIVE

Possession of a Firearm with Altered Identification Marks

On or about February 10, 2016, at St. Thomas, in the District of the Virgin Islands, the defendant,

MOHAMMED JUBRAN,

unauthorized by law, had, possessed, bore, transported, carried, actually and constructively, and had under his proximate control, openly and concealed, a Romarm CUGIR, 7.62mm assault rifle, as defined in Title 23 V.I.C. § 451(d), with altered identification marks.

All in violation of Title 23, Virgin Islands Code, Section 481(b).

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The Grand Jury further charges that:

COUNTS SIX THROUGH EIGHT

Unauthorized Possession of Firearms

From on or about September 1, 2015 through on or about February 10, 2016, at St. Thomas, in the District of the Virgin Islands and elsewhere, the defendants,

MOHAMMED JUBRAN,

aided and abetted by each other and others known and unknown, unauthorized by law, had, possessed, bore, transported, or carried, either actually and constructively, loaded or unloaded, openly or concealed, firearms, as defined in Title 23, Virgin Islands Code, Section 451(d), with each such firearm constituting a separate count of the Indictment as set forth below:

COUNT	DATE	DESCRIPTION OF FIREARM
6	October 15, 2015	ITM Arms Co., model AK-47, 5.45x39mm caliber, serial number 0001973
7	October 28, 2015	Beretta 9mm, model 92FS, serial number BER435278
8	February 10, 2016	Romarm CUGIR, 7.62mm, serial number obliterated

All in violation of Title 14, Virgin Islands Code, Sections 2253(a) and 11(a).

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The Grand Jury further charges that:

COUNT NINE

Sale of Firearms without a License

From on or about September 1, 2015 through on or about February 10, 2016, at St. Thomas, in the District of the Virgin Islands and elsewhere, the defendants,

MOHAMMED JUBRAN,

aided and abetted by each other and others known and unknown, unauthorized by law, sold, had in his possession with the intent to sell, exposed for sale or advertised for sale, any firearm without so being licensed.

All in violation of Title 23, Virgin Islands Code, Section 467 and Title 14, Virgin Islands Code, Section 11(a).

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NOTICE OF FORFEITURE

There is probable cause to believe that upon conviction of one or more of the offenses alleged in this Indictment, the defendants:

MOHAMMED JUBRAN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms involved in the commission of the offenses, including but not limited to the following firearms and associated ammunition:

1. ITM Arms Co., model AK-47, 5.45x39mm caliber, serial number 0001973,
2. Beretta 9mm, model 92FS, serial number BER435278, and
3. Romarm CUGIR, 7.62mm, serial number obliterated

If any of the above described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

It is the intent of the United States, pursuant to Title 18, United States Code, Section 924(d)(2)(c) and Title 28, United Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

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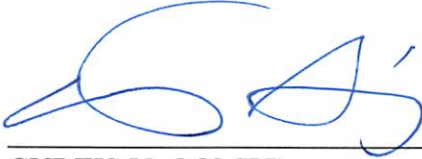
The Grand Jury returned a TRUE BILL.

RONALD W. SHARPE
UNITED STATES ATTORNEY

By:  _____
Sigrid M. Tejo-Sprotte
Assistant United States Attorney

DISTRICT OF THE VIRGIN ISLANDS: September 8, 2016.

Returned into the District Court by Grand Jurors and filed.

 _____
CURTIS V. GOMEZ
UNITED STATES DISTRICT JUDGE

Rec'd JUI-51 09 08 16 PM 03:51